



Richard Hernandez
Partner
T. 973-848-8615
F. 973-297-6615
rhernandez@mccarter.com

McCarter & English, LLP
Four Gateway Center
100 Mulberry Street
Newark, NJ 07102-4056
www.mccarter.com

October 27, 2020

VIA ECF

The Honorable Lois H. Goodman, U.S.M.J.
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building and U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

**Re: *In re Valeant Pharmaceuticals International, Inc. Securities Litigation*,
Docket No. 3:15-cv-07658-MAS-LHG**

Dear Judge Goodman:

On behalf of Defendants Valeant Pharmaceuticals International, Inc. (n/k/a Bausch Health Companies Inc.), Robert L. Rosiello, Ari S. Kellen, Ronald H. Farmer, Colleen Goggins, Robert A. Ingram, Anders Lönner, Theo Melas-Kyriazi, Robert N. Power, Norma Provencio, and Katharine B. Stevenson, I enclose a copy of the following:

1. Declaration of Richard Hernandez in support of Application for *Pro Hac Vice* Admission;
2. Declaration of Susannah S. Geltman in support of Application for *Pro Hac Vice* Admission;
3. Proposed Form of Consent Order; and
4. Certification of Service.

Defendants submit this application with the consent of counsel for Plaintiffs. If Your Honor finds the enclosed proposed Consent Order acceptable, we respectfully request that it be entered.

Respectfully submitted,

/s/ Richard Hernandez

Richard Hernandez

Enclosures

cc: All Counsel of Record (via ECF)

McCARTER & ENGLISH, LLP
Four Gateway Center
100 Mulberry Street
Newark, New Jersey 07102
(973) 622-4444

SIMPSON THACHER & BARTLETT LLP
425 Lexington Avenue
New York, New York 10017
(212) 455-2641

Attorneys for Defendants
Valeant Pharmaceuticals International, Inc.
(n/k/a Bausch Health Companies Inc.),
Robert L. Rosiello, Ari S. Kellen, Ronald H.
Farmer, Colleen Goggins, Robert A. Ingram,
Anders Lönner, Theo Melas-Kyriazi, Robert
N. Power, Norma Provencio, and Katharine
B. Stevenson.

**IN THE UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF NEW JERSEY**

RICHARD HERNANDEZ, pursuant to 28 U.S.C. §1746, declares as follows:

1. I am an attorney-at-law of the State of New Jersey and a member of the law firm of McCarter & English, LLP, attorneys for Defendants Valeant Pharmaceuticals International, Inc. (n/k/a Bausch Health Companies Inc.), Robert L. Rosiello, Ari S. Kellen, Ronald H. Farmer, Colleen Goggins, Robert A. Ingram, Anders Lönnér, Theo Melas-Kyriazi, Robert N. Power,

Norma Provencio, and Katharine B. Stevenson. I submit this Declaration in support of the application of Susannah S. Geltman of the law firm of Simpson Thacher & Bartlett LLP, for admission to the Bar of this Court *pro hac vice* for the purpose of acting as co-counsel to Defendant in this action. I am familiar with the facts and information set forth herein.

2. I am a member in good standing of the New Jersey Bar, the Bar of this Court and the New York Bar.

3. Ms. Geltman will be associated with me in the pursuit of this matter. I will be responsible for the conduct of Ms. Geltman for the case. I, or another member of McCarter & English, LLP, who is a member in good standing of the New Jersey Bar and the Bar of this Court, will sign all pleadings, briefs and other papers filed with the Court.

4. I, or another member of McCarter & English, LLP, who is a member in good standing of the New Jersey Bar and the Bar of this Court, will make all court appearances.

5. I have advised Ms. Geltman of the Rules of the United States District Court for the District of New Jersey, including, but not limited to the provisions of L. Civ. R. 103.1, Judicial Ethics and Professional Responsibility; L. Civ. R. 101.1(c), Admission of Attorneys: Appearance Pro Hac Vice; Local Counsel; and L. Civ. R. 104.1, Discipline of Attorneys. I will ensure that Ms. Geltman complies with L. Civ. R. 101.1(c).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my personal knowledge.

/s/ Richard Hernandez
Richard Hernandez

Dated: October 27, 2020

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**IN THE UNITED STATES DISTRICT
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SUSANNAH S. GELTMAN, pursuant to 28 U.S.C. §1746, declares as follows:

1. I am a partner with the law firm of Simpson Thacher & Bartlett LLP. My business address is 425 Lexington Avenue, New York, New York 10017. I make this Declaration in support of the motion to admit me *pro hac vice* for purposes of appearing on behalf of Defendants Valeant Pharmaceuticals International, Inc. (n/k/a Bausch Health

Companies Inc.), Robert L. Rosiello, Ari S. Kellen, Ronald H. Farmer, Colleen Goggins, Robert A. Ingram, Anders Lönner, Theo Melas-Kyriazi, Robert N. Power, Norma Provencio, and Katharine B. Stevenson (collectively, “Defendants”) in this matter.

2. I was admitted to practice in the State of New York on May 21, 2007. The office and address of the official maintaining my New York admission is: New York State Supreme Court Appellate Division, First Department, 41 Madison Avenue, 26th Floor, New York, NY 10010.

3. I have also been admitted to practice in the following courts:

Southern District of New York	2008
Eastern District of New York	2008

4. I am a member in good standing and eligible to practice in the courts listed above.

5. The names and addresses of the official or offices maintaining the rolls of my membership to these bars are: United States District Court for the Southern District of New York, 500 Pearl Street, New York, NY 10007; United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY 11201.

6. I understand that I have a continuing obligation to notify the Court of any matter affecting my standing to the bar of the State of New York or of any other court in which I am admitted to practice.

7. Our law firm is counsel for Defendants, and Defendants have requested that we represent them in all aspects of this case, including trial, and I accordingly seek *pro hac vice* admission for these purposes.

8. There are no disciplinary proceedings presently pending against me in any jurisdiction, and no discipline has been previously imposed upon me in any jurisdiction.

9. I understand that if I am admitted *pro hac vice* I will be subject to the disciplinary jurisdiction of the United States District Court for the District of New Jersey and will comply with the Rules of Professional Conduct of the New Jersey Supreme Court, the requirements of the Rules Governing the Courts of the State of New Jersey regarding the conduct of attorneys admitted to the practice of law in this State, and the Local Rules of the United States District Court for the District of New Jersey, particularly the requirements of Local Rule 101.1(c).

10. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2(a).

11. I agree to have all pleadings, briefs and other papers filed with the Court signed by a member of the law firm of McCarter & English, LLP, attorneys of record authorized to practice in the State of New Jersey.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my personal knowledge.

/s/ Susannah S. Geltman

Susannah S. Geltman

Dated: October 27, 2020

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B. Stevenson.

**IN THE UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF NEW JERSEY**

THIS MATTER having been opened to the Court by McCarter & English, LLP, attorneys for Defendants Valeant Pharmaceuticals International, Inc. (n/k/a Bausch Health Companies Inc.), Robert L. Rosiello, Ari S. Kellen, Ronald H. Farmer, Colleen Goggins, Robert A. Ingram, Anders Lönnér, Theo Melas-Kyriazi, Robert N. Power, Norma Provencio, and

Katharine B. Stevenson, seeking an Order admitting Susannah S. Geltman of the law firm of Simpson Thacher & Bartlett LLP, *pro hac vice*, and the Court having considered this matter, and good cause having been shown;

IT IS on this _____ day of _____, 2020,

ORDERED as follows:

1. Susannah S. Geltman be and is hereby admitted *pro hac vice* to appear in this matter for all purposes on behalf of Defendants;

2. All pleadings, briefs and other papers filed with the Court on behalf of Defendant shall be signed by a member of the firm of McCarter & English, LLP, who shall be responsible for said papers, and for the conduct of the cause, and who shall be present in Court during all phases of these proceedings, unless expressly excused by the Court, and who will be held responsible for the conduct of the attorneys admitted hereby;

3. Susannah S. Geltman shall remit to the New Jersey Lawyers' Fund for Client Protection the annual payment required in accordance with New Jersey Court Rule 1:28-2(a) for each calendar year this matter is pending;

7. Susannah S. Geltman shall pay \$150.00 to the Clerk, United States District Court for the District of New Jersey; and

8. Susannah S. Geltman is required to abide by the Rules governing this Court, including all disciplinary rules, and to notify the Court immediately of any matter affecting his standing at the bar of any other court.

HON. LOIS H. GOODMAN, U.S.M.J.

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**IN THE UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF NEW JERSEY**

RICHARD HERNANDEZ, hereby certifies as follows:

1. I am an attorney-at-law of the State of New Jersey and a member of the law firm of McCarter & English, LLP, attorneys for Defendants Valeant Pharmaceuticals International, Inc. (n/k/a Bausch Health Companies Inc.), Robert L. Rosiello, Ari S. Kellen, Ronald H. Farmer,

Colleen Goggins, Robert A. Ingram, Anders Lönnér, Theo Melas-Kyriazi, Robert N. Power, Norma Provencio, and Katharine B. Stevenson.

2. On October 27, 2020, I caused copies of the (i) supporting Declaration of Richard Hernandez; (ii) supporting Declaration of Susannah S. Geltman; and (iii) a proposed form of Order to be served on all counsel of record via electronic case filing.

/s/ Richard Hernandez
Richard Hernandez

Dated: October 27, 2020